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15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA,
17 SAN FRANCISCO DIVISION

18
19 GOOGLE LLC,
20 Plaintiff and Counter-defendant,
21 v.
22 SONOS, INC.,
23 Defendant and Counter-claimant.

Case No. 3:20-cv-06754-WHA
Related to Case No. 3:21-cv-07559-WHA

**DECLARATION OF CLEMENT
ROBERTS IN SUPPORT OF SONOS,
INC.'S ADMINISTRATIVE MOTION
TO FILE UNDER SEAL RE JOINT
DISCOVERY LETTER BRIEF**

1 I, Clement Roberts, declare as follows and would so testify under oath if called upon to do
 2 so:

3 1. I am an attorney with the law firm of Orrick, Herrington & Sutcliffe LLP, counsel
 4 of record to Sonos, Inc. (“Sonos”) in the above-captioned matter. I am a member in good
 5 standing of the Bar of the State of California. I make this declaration based on my personal
 6 knowledge, unless otherwise noted. If called, I can and will testify competently to the matters set
 7 forth herein.

8 2. I make this declaration in support of Sonos’s Administrative Motion to File Under
 9 Seal in connection with Sonos, Inc.’s and Google LLC’s (“Google”) Joint Discovery Letter Brief
 10 (“Joint Discovery Letter Brief”).

11 3. Sonos seeks an order sealing the materials as listed below:

DOCUMENT	PORTIONS TO BE SEAL	DESIGNATING PARTY
Joint Discovery Letter Brief	Portions highlighted in blue	Sonos
Joint Discovery Letter Brief	Portions highlighted in yellow	Sonos and Google
Exhibit 1 to Joint Discovery Letter Brief	Portions highlighted in blue	Sonos
Exhibit 1 to Joint Discovery Letter Brief	Portions highlighted in yellow	Sonos and Google

19 4. The portions of the Joint Discovery Letter Brief and Exhibit 1 highlighted in blue
 20 and yellow contain references Sonos’s confidential business information and trade secrets,
 21 including Sonos’s research and development processes. The specifics of how these
 22 functionalities and processes operate is confidential information that Sonos does not share
 23 publicly. Thus, public disclosure of such information may lead to competitive harm as Sonos’s
 24 competitors could use these details regarding the architecture and functionality of these products
 25 to gain a competitive advantage in the marketplace with respect to their competing products.
 26 Additionally, some of the yellow highlighted portions include terms to confidential agreements
 27 that are not public. Disclosure of this information would harm Sonos’s competitive standing by
 28 giving Sonos’s competitors highly sensitive information about Sonos’s business dealings with

1 other entities. A less restrictive alternative than sealing the portions of the Joint Discovery Letter
2 Brief and Exhibit 1, as indicated in the table above, would not be sufficient because the
3 information sought to be sealed is Sonos's confidential business information and trade secrets and
4 is integral to Sonos's legal arguments.

5

6 I declare under penalty of perjury that the foregoing is true and correct to the best of my
7 knowledge. Executed this 23rd day of January, 2023 in Belvedere, California.

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9 */s/ Clement S. Roberts*
10 Clement S. Roberts

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